

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-mj-02575 Becerra

UNITED STATES OF AMERICA

v.

FILED UNDER SEAL

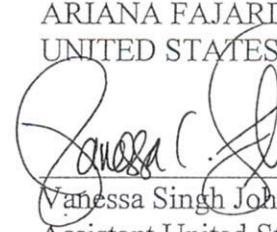
WILLIE DISHON MATTHEW OBADIAH,

Defendant.

CRIMINAL COMPLAINT COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003?  Yes  No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007?  Yes  No

Respectfully submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY  
BY:   
Vanessa Singh Johannes  
Assistant United States Attorney  
Court ID No. A5501644  
99 N.E. 4th Street, 8<sup>th</sup> Floor  
Miami, Florida 33132-2111  
Tel: (305) 961-9023  
Fax: (305) 536-4699  
Vanessa.S.Johannes@usdoj.gov

04/16/2019  
@ 10:05 am

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America )  
 v. )  
 WILLIE DISHON MATTHEW OBADIAH )  
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Case No. 1:19-mj-02575 Becerra

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 28 - March 2, 2019 in the county of MIAMI-DADE in the  
SOUTHERN District of FLORIDA, the defendant(s) violated:

*Code Section*

TITLE 18, UNITED STATES  
 CODE, SECTIONS 1591(a)(1),  
 1591(b)(2) and 1591(b)(1).

*Offense Description*

Defendant did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means a person, that is, the Minor Victim, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe the Minor Victim, that the Minor Victim had not attained the age of 18 years and would be caused to engage in a commercial sex act. Further the offense was effected by means of force, threats of force, or coercion.

This criminal complaint is based on these facts:

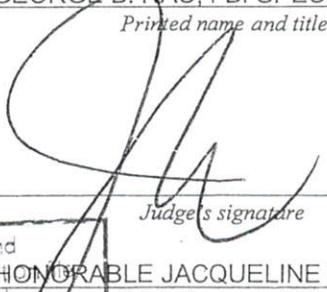
SEE ATTACHED AFFIDAVIT OF FBI SPECIAL AGENT GEORGE B. NAU.

Continued on the attached sheet.

  
 Complainant's signature

GEORGE B. NAU, FBI SPECIAL AGENT

Printed name and title

  
 Judge's signature

Sworn to before me and signed in my presence.

Date: 4.16.19

City and state: MIAMI, FLORIDA

Certified to be a true and correct copy of the document Angela E. Noble, Clerk U.S. District Court Southern District of Florida	
By	JDY
Date	4/16/19

Printed name and title

FILED UNDER SEAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, George B. Nau, having first been duly sworn, hereby depose and state as follows:

AFFIANT'S BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since April 1998. Thus, I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code. That is, I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, violations of federal law, including the offenses enumerated in Title 18, United States Code, Sections 1591, 2422, and 2423, *et seq.*

2. I currently serve as part of the Crimes Against Children Squad and the FBI Child Exploitation Task Force in the FBI's Miami Field Office. My duties include the investigation of crimes involving the sexual exploitation of minors, including the sex trafficking and commercial trafficking of minors and the possession and production of child pornography. I have received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in child exploitation investigations, and have executed search warrants that have led to seizures of child pornography and undercover operations to recover juvenile victims of sex trafficking.

PURPOSE OF THE AFFIDAVIT

3. This affidavit is submitted in support of a criminal complaint charging that **WILLIE DISHON MATTHEW OBADIAH**, from on or about February 28, 2019 through on or about March 2, 2019, in Miami-Dade County and elsewhere, did knowingly, in and affecting

interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means a person, that is, the Minor Victim, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe the Minor Victim, that the Minor Victim had not attained the age of 18 years and would be caused to engage in a commercial sex act, which carries a minimum mandatory term of 10 years' imprisonment, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2). It is further alleged that the offense was effected by means of force, threats of force, or coercion, which carries a minimum mandatory sentence of 15 years of imprisonment and up to life imprisonment, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

4. The statements contained in this affidavit are based upon my own personal knowledge, as well as information provided by other individuals, including other law enforcement officials, and my review of records obtained during the course of this investigation. I have not included in this affidavit each and every fact and circumstance known to me, but only the facts and circumstances sufficient to establish probable cause.

#### PROBABLE CAUSE

- Recovering and Interviewing the Minor Victim

5. On March 4, 2019, a 17-year-old minor female's (hereinafter referred to as "Minor Victim") relative called law enforcement to report that Minor Victim was an alleged victim of human trafficking. Law enforcement responded to an address in Miami Gardens, Florida, where the Minor Victim was recovered.

6. On March 5, 2019, Minor Victim was interviewed by law enforcement. In part, she provided the following information. On or about February 24, 2019, the Minor Victim ran

away from her foster home in Greensboro, North Carolina. A friend of Minor Victim's took her to a friend's house in Columbus, North Carolina, where she stayed until approximately February 28, 2019, whereon Minor Victim was picked up by **OBADIAH**.

7. The Minor Victim met **OBADIAH** through Facebook. Specifically, **OBADIAH** had been in contact with the Minor Victim via Facebook for approximately two weeks prior to picking her up. **OBADIAH**'s Facebook profile is "Tonie Ahora Tocaa." **OBADIAH** utilized the name "Tonie" when he spoke to Minor Victim. **OBADIAH** attempted to initiate contact with Minor Victim on Facebook Messenger. Initially, the Minor Victim ignored **OBADIAH**'s repeated attempts for approximately one week prior to accepting messenger contact with him.

8. During their contact on messenger, Minor Victim incorrectly advised **OBADIAH** that she was 18 years old. **OBADIAH** told Minor Victim that she looked young and requested proof of her age. Minor Victim sent **OBADIAH** a picture of her actual identification card, showing **OBADIAH** that she was in fact 17 years old. Minor Victim also advised **OBADIAH** that she was a runaway. Knowing Minor Victim's age and that she was a runaway, **OBADIAH** requested her address and picked her up. At the time, it was Minor Victim's understanding that she was getting picked up to go on a road trip to Miami, where she would just smoke and walk on the beach.

9. After picking up Minor Victim on or about February 28, 2019, **OBADIAH** drove Minor Victim and another female known as "K.E." to a hotel in Charlotte, North Carolina. After arriving at the hotel, **OBADIAH** had a conversation with Minor Victim, wherein he explained that he would be posting ads of her online for prostitution services. **OBADIAH** told Minor Victim that she was now a part of his family. Minor Victim feared for her safety upon hearing this.

10. Minor Victim was then taken to room 117 of the hotel, wherein she had three

different prostitution “in-calls.” Each “in-call” consisted of penile/vaginal intercourse. An “in-call” is when the customer seeking prostitution services travels to meet the prostitute (versus an “out-call,” where the prostitute travels to meet the customer). **OBADIAH** instructed the Minor Victim to text the number “1” to him when the customer arrived at the hotel room, and to text the number “2” to him when the customer left. **OBADIAH** also sent Minor Victim the following, via text: “QV60HH100.” This meant \$60 for a quick visit (“QV60”) and \$100 for half-of-an-hour (“HH100”). **OBADIAH** utilized the term “bop” for customers. The Minor Victim made approximately \$500 for sexual services with three “bops.”

11. Minor Victim was instructed by **OBADIAH** to have the “bops” place the money on top of the microwave inside of the hotel room. Minor Victim was instructed not to touch the money until the “bop” pulled his pants down and showed her his penis. She was told by **OBADIAH** that law enforcement officers do not expose themselves. Minor Victim was also instructed to never do anything that would not please the “bop.” Minor Victim asked **OBADIAH** for the money from the sex acts but was told by **OBADIAH** that she could not get her money. He said he would hold onto it.

12. On or about March 1, 2019, **OBADIAH**, “K.E.” and Minor Victim left for Miami, Florida. Before leaving Charlotte for Miami, they were joined by the following females: “June,” “Day 1,” “Justice,” and “Kimmie”. On the trip to Miami, **OBADIAH** forced Minor Victim to use cocaine. **OBADIAH** had Minor Victim discard her identification card on the way down to Miami and stated that he would get her a new identification card later. During the drive south, Minor Victim heard **OBADIAH** threatening to harm a female, via a telephone call. She believed he was speaking to another prostitute. Based upon **OBADIAH**’s comments to this unknown female,

Minor Victim was afraid of **OBADIAH**. Minor Victim stated that she never saw "Tonie," as she still knew him, carrying a gun, but she saw him carrying a bag and did not know what was in it.

13. The group specified above arrived in Miami on or about March 2, 2019. After spending a short period of time at a motel in Hialeah, Florida, they proceeded to another hotel in Miami. At some point after arriving in the Miami area, **OBADIAH** reposted Minor Victim's "services" online, and arranged four "in-calls" for her. Minor Victim had penile/vaginal intercourse with all four "bops." Each "bop" paid her \$200. After having sex with the first "bop," **OBADIAH** had Minor Victim take four different pills. Minor Victim knew that one was a Percocet and another was a Xanax bar. The other two pills were unknown to Minor Victim.

14. After the four "bops" left, Minor Victim attempted to contact **OBADIAH** but he did not respond. Minor Victim was awoken later that evening by **OBADIAH** and forced to perform oral sex on him. When **OBADIAH** ejaculated into Minor Victim's mouth, she spit it out. **OBADIAH** raised his hand to punch Minor Victim for doing this, and Minor Victim stuck her hand out to block the blow. **OBADIAH** told Minor Victim to never touch a pimp and attempted to further sexually assault her. Minor Victim was able to get out of the hotel room and was eventually caught by **OBADIAH**. **OBADIAH** took Minor Victim to South Beach and left her with the other adult females that had come to Miami with them.

15. When Minor Victim was alone with Day 1 and Justice, she told them about her age and that she had been sexually assaulted by **OBADIAH**. Upon hearing this, they drove Minor Victim to a relative's home in the Miami area and left her there.

16. Minor Victim was shown a photograph of a Facebook page associated with "Tonie Ahora Tocca." Minor Victim signed and dated the picture indicating the person on this Facebook

profile was the individual she knew as “Tonie,” that is, **OBADIAH**.

- **Subsequent Investigation by Law Enforcement**

17. Further investigation by law enforcement revealed that the “url” for the Facebook profile of “Tonie Ahora Tocca” contained the name “Dishon.Willie.18.” A query of the name Willie Dishon was conducted in North Carolina’s Driver’s License database. This query provided a photograph of **OBADIAH**, which is consistent with the individual depicted in the Facebook profile for “Tonie Ahora Tocca.”

18. During the interview of Minor Victim, she stated that the group drove to Miami in two white vehicles, possibly a Toyota or Nissan. Minor Victim also stated they stayed in rooms 225 and 207 at the motel in Hialeah. Minor Victim remembered staying in room 420 at the other hotel in Miami, and that the person that rented the hotel room was named “G.” (Note: the motel and hotel names, as well as “G.’s” first name were provided by Minor Victim and are known to law enforcement.)

19. Investigation at the motel in Hialeah revealed that room 225 was rented to a person with the initials “C.P.,” from a known address in Charlotte, North Carolina. (Note: “C.P.’s” full name is known to law enforcement, but not revealed herein due to privacy concerns.) “C.P.” drives a white Nissan registered in North Carolina. Room 207 was rented in Minor Victim’s presence by Justice, using the name “Nichole.” A review of the rental for room 207 revealed it was rented by a person with the initials “N.T.” (Note: the full name is known by law enforcement, but again, for privacy, is not revealed herein.) The Minor Victim had previously identified Justice’s Facebook page, which had a user identification name that matched the identification of “N.T.” Additionally, the Minor Victim can be seen on video surveillance at the motel in Hialeah on the date in question

with a group of black females utilizing a white car.

20. Investigation at the other hotel in Miami revealed that room 420 was rented by a person with the initials "R.G.," and whose last name is the same as "G.," which was provided by the Minor Victim and referenced above. A review of the video surveillance from the hotel in Miami shows that the Minor Victim can be seen at the hotel on the dates she stated she was prostituted from that location.

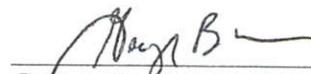
#### CONCLUSION

21. Based on my training and experience, and as further supported by the facts in this affidavit, I respectfully submit that there is probable cause to believe that **WILLIE DISHON** **MATTHEW OBADIAH**, from on or about February 28, 2019 through on or about March 2, 2019, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means a person, that is, the Minor Victim, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe the Minor Victim, that the Minor Victim had not attained the age of 18 years and would be caused to engage in a commercial sex act, which carries a minimum mandatory term of 10 years' imprisonment, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(2).

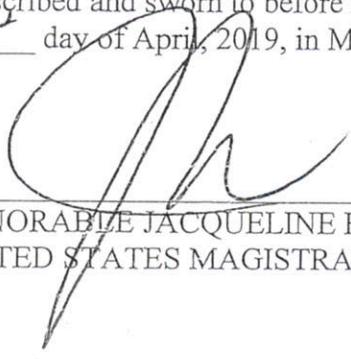
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It is further alleged that the offense was effected by means of force, threats of force, or coercion, which carries a minimum mandatory sentence of 15 years of imprisonment and up to life imprisonment, in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
George B. Nau, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me on this  
16 day of April, 2019, in Miami, Florida:

  
HONORABLE JACQUELINE BECERRA  
UNITED STATES MAGISTRATE JUDGE

Certified to be a true and correct copy of the document on file	
Angela E. Noble, Clerk, U.S. District Court Southern District of Florida	
By	<u>JDV</u>
Date	<u>4/16/19</u> Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

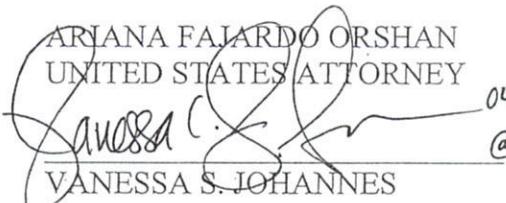
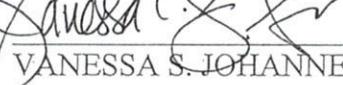
CASE NO. 1:19-mj-02575 Bocerra

IN RE SEALED COMPLAINT  
UNITED STATES OF AMERICA v.  
DEFENDANT OBADIAH

MOTION TO FILE COMPLAINT UNDER SEAL

NOW COMES the United States of America, by and through its undersigned attorney, and respectfully requests that the criminal complaint (charging Defendant Willie Dishon Matthew OBADIAH), dated April 16, 2019, supporting affidavit thereto, cover sheet, arrest warrant, this motion, and any resulting order be and remain SEALED until the arrest of the defendant, or until further order of this court, except that the United States Attorney's Office may obtain copies of said complaint, arrest warrant, or other sealed document for purposes of arrest, extradition, or any other necessary cause, for the reasons that the named defendant may flee, and the integrity of the ongoing investigation might be compromised should any of the foregoing documents be made publicly available at this time.

Respectfully submitted,

By:   
ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY  
  
04/16/2019  
@ 10:05am  
VANESSA S. JOHANNES  
ASSISTANT UNITED STATES ATTORNEY  
Court No. A5501644  
99 N.E. 4th Street  
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(305) 536-4676 Facsimile  
Vanessa.S.Johannes@usdoj.gov

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:19-mj-02575 Becerra

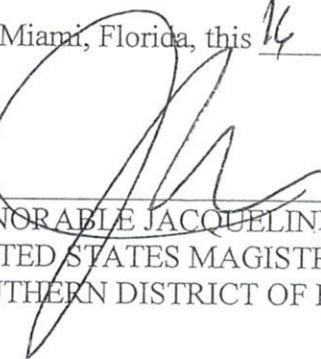
IN RE SEALED COMPLAINT  
UNITED STATES OF AMERICA v.  
DEFENDANT OBADIAH

SEALING ORDER

The United States of America, having applied to this Court for an Order sealing the criminal complaint, cover sheet, arrest warrant, and this order and the Court finding good cause:

IT IS HEREBY ORDERED that the criminal complaint (charging Defendant Willie Dishon Matthew OBADIAH), dated April 16, 2019, supporting affidavit thereto, cover sheet, arrest warrant, this motion, and any resulting order shall be filed and remain under seal until the arrest of the defendant, or until further order of this Court. However, the United States Attorney's Office may obtain copies of any complaint, arrest warrant, or other sealed document for purposes of arrest, extradition, or any other necessary cause.

DONE AND ORDERED in Chambers at Miami, Florida, this 16 day of April, 2019.

  
HONORABLE JACQUELINE BECERRA  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF FLORIDA

Certified to be a true and correct copy of the document on file	
Angela E. Noble, Clerk, U.S. District Court	
Southern District of Florida	
By	
Date	4/16/19 Deputy Clerk